

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Joyel Ryan and James W. Ryan Jr.	: No. 18-12420-amc
	:
Deutsche Bank NTC as Trustee	: Chapter 13
	:
v.	:
	:
Joyel Ryan and James W. Ryan Jr.	:

Response to Motion for Relief filed by Deutsche Bank NTC as Trustee

Debtor, by and through his attorney, responds as follows:

1-6. Admitted.

7-12 Denied. Strict proof thereof is demanded at trial. Debtor has recently returned to work and can now make the payments. Debtor has since made some payments and Movant has refused additional payments and has miscalculated the amount due. Movant is adequately protected since there is equity in the real estate and the real estate is necessary for an effective reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

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